



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Post Office Box 1306
Albuquerque, New Mexico 87103



In Reply Refer To:
FWS/R2/NWRS/Coastal TX/066633

OCT 13 2017

Mr. Paul Enriquez
Real Estate and Environmental Branch Chief
U.S. Customs and Border Protection
1300 Pennsylvania Avenue NW
Washington, DC 20229

Dear Mr. Enriquez:

Thank you for your letter dated August 25, 2017, regarding U.S. Customs and Border Protection's (CBP) proposed border infrastructure in South Texas which includes the installation of 35 gates in existing border fence gaps, 32 miles of bollard wall, and 28 miles of levee wall. The U.S. Fish and Wildlife Service (Service) reviewed your letter and is providing our initial concerns related to Federally listed species, other Federal trust resources, and Santa Ana and Lower Rio Grande Valley National Wildlife Refuges (NWR). Once there is a spatially explicit proposed action, assuming no waiver is issued by Department of Homeland Security, we can provide a formal response and coordination under applicable Federal laws, including the National Environmental Policy Act, National Wildlife Refuge System (Refuge System) Improvement Act, Migratory Bird Treaty Act, and Endangered Species Act.

Over the past several years, there has been a substantial increase in coordination between the Service, CBP, and the U.S. Border Patrol Rio Grande Valley Sector along the Texas border. The Service appreciates the excellent communication and information sharing that has occurred and looks forward to maintaining this relationship into the future.

The Refuge System lands in the Lower Rio Grande Valley are considered to be one of the most biodiverse in the continental United States. In general, our concerns are similar to those discussed during initial border wall/fence construction in 2008. The Service will continue to work with CBP on the proposed activities, with a focus on ensuring impacts to Santa Ana and Lower Rio Grande Valley NWRs are analyzed and minimized, to the extent possible.

Socio-economic & Visitor Impacts

The Service is specifically concerned with potential tourism and visitor impacts on the affected NWRs. Ongoing efforts by the Service, the state of Texas, private landowners, and non-profit organizations have helped create a wildlife corridor linking numerous isolated habitat fragments in the Lower Rio Grande Valley. These efforts have helped produce habitats that are harboring unique species of plants and animals, making the area a destination for ecotourists.

The economics of Lower Rio Grande Valley wildlife and habitat diversity are important to the international border region, as over 150,000 tourists contribute approximately \$10.8 million annually to the regional economy. The Santa Ana NWR is the most accessible public land for residents of Hidalgo County and approximately 70 percent of visitors come from outside of the local area. Visitors participating in outdoor recreational activities economically benefit the local community.

Construction of the border wall, as proposed, will likely affect visitation and the quality of visitor experience to the affected NWRs. Construction of the border wall along the levee will separate the Santa Ana NWR visitor center and all administrative facilities (equipment storage, residences, parking lots, etc.) from the rest of the refuge (99 percent of refuge lands). The proposal could result in visitors entering and exiting Santa Ana NWR through a large gate, similar to going through a security checkpoint. This could result in a reduction in visitation due to a perceived unsafe and unwelcoming atmosphere, which in turn could impact local economies.

Enforcement Zones

Construction of a 150-foot enforcement zone will directly remove habitat used by threatened and/or endangered species and other wildlife in the area. The enforcement zone will also create barriers and restrict wildlife movement, especially for species such as ocelots, which require dense brush to travel through. The Service recommends minimizing this zone, as operations allow, especially in and near thick thornscrub and walking trails. We also recommend calculating the direct habitat loss of the 150-foot enforcement zone based on a vegetation and endangered species survey. The proposed cleared enforcement zone in Hidalgo County will directly remove approximately 170 acres of habitat from Lower Rio Grande Valley and Santa Ana NWRs reducing the ability to meet refuge purposes and impacting the visitor experience. The Service recommends leaving vegetated areas near entrances and exits to public use areas to mitigate the potential impacts to the visiting public and quality of their experience.

Lighting

Increased lighting at night, along the wall, will likely have negative impacts on ocelot, jaguarundi and other nocturnal species by making them more susceptible to predation. The Service recommends down shielding lights to focus away from thornscrub habitat and shining lights only within the enforcement zone. The Service recommends CBP continue to analyze the effects of lighting to nocturnal wildlife and work with the Service to minimize impacts.

All Weather Roads

The Service recommends the width of all roads created or maintained by CBP be measured and recorded using Geographic Information System (GPS) coordinates and integrated into the CBP

GPS database. The Service suggests maintenance actions not increase the width of the roadbed or the amount of disturbed area beyond the roadbed. The all-weather road within the enforcement zone is capable of high speed use, causing concern for public safety and increased wildlife mortality. The Service requests coordination to address speeding issues, especially near high visitor use areas.

The Service's comments in this letter are based upon general information we have been given to date. The Service may change these comments and opinions depending on more specific information regarding the border wall that we expect will be provided by CBP in the future. We appreciate the opportunity to provide informal comments and look forward to continued coordination on the proposed project. Please feel free to contact me at 505-248-6282 if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Regional Director

cc: Field Supervisor, Texas Coastal Ecological Services Field Office, Houston, Texas
Refuge Manager, South Texas National Wildlife Refuge Complex, Alamo, Texas
Inter-agency Borderlands Coordinator, Department of Interior Washington, D.C.
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